



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MLM:BWB/ZA

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 14, 2010

Via U.S. Mail and ECF

Michael Hueston, Esq.
Cardinale, Hueston & Marinelli
350 Fifth Avenue, Suite 4810
New York, NY 10118

Re: United States v. Kareem Ibrahim
Criminal Docket No. 07-543 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, and subject to the provisions set forth in the Stipulation and Order signed by the parties and ordered by the Court on July 2, 2008, the government herein furnishes supplemental discovery. In addition, the government reiterates its request for reciprocal discovery, as set forth in full in the government's initial discovery letter.

In response to your letter dated September 10, 2010, the Office of the United States Attorney takes no position regarding the admissibility of any witness, but has forwarded the letters from counsel to the appropriate agencies and will provide additional information as it is received.

Enclosed please find copies of Government Exhibits 6 and 80-83 from the trial of co-defendants Russell Defreitas and Abdul Kadir (the "Defreitas trial"). Transcripts of the testimony of expert witnesses at the Defreitas trial are enclosed. Also enclosed please find a December 2006 report, disclosed as 3500-MH-16 at the Defreitas trial. We have no other discoverable materials that are responsive to your requests, though we reserve the right, of course, to supplement our disclosures.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: /s/
Marshall L. Miller
Jason Jones
Berit W. Berger
Zainab Ahmad
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Encl.

cc: Clerk of the Court (DLI) (via ECF) (w/o encl.)